

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ENERGYLINK CORPORATION
d/b/a ENERGYLINK INTERNATIONAL,

Plaintiff,

v.

BRADEN GROUP B.V.
f/k/a INNOVA GLOBAL EUROPE B.V.,

Defendant.

C.A. No. 4:23-cv-00626

**DEFENDANT'S MOTION FOR LEAVE FOR ATTORNEY
KEVIN SU TO APPEAR AS ATTORNEY IN CHARGE**

Pursuant to Local Rule 83.1K, Defendant Braden Group B.V. ("Braden"), hereby moves this Court for leave for Kevin Su to appear as attorney-in-charge for Braden in the above-captioned matter. In support thereof, Braden states as follows:

1. Mr. Su has been an attorney in good standing before the bar of Massachusetts for 18 years. He is also admitted to practice in the United States District Court for the Eastern District of Texas, United States District Court for the Western District of Wisconsin, and Court of Appeals for the Federal Circuit.

2. Mr. Su has been admitted *pro hac vice* to practice in various Federal district courts over the span of his legal career. He is currently admitted *pro hac vice* in cases before the Courts of United States District Courts for the Central and Northern Districts of California, United States District Court for the Northern District of Illinois, United States District Court for the Southern District of New York, and United States District Court for the Southern District of Texas.

3. Mr. Su has never been the subject of any disciplinary proceedings.

4. Mr. Su has concurrently filed a motion for *pro hac vice* admission to this Court.

5. Mr. Su will be working with Bailey K. Benedict, who has been admitted in the Southern District of Texas, has been active in this district for over a decade, and will serve in an of-counsel role representing Braden pursuant to Local Rule 11.3B.

WHEREFORE, Defendant Braden respectfully asks that the Court enter an order granting Mr. Su's request for *pro hac vice* admission, and approving his designation as attorney-in-charge.

Dated: March 14, 2023

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ Bailey K. Benedict

Kevin Su, Attorney-in-Charge (*Pro Hac Vice forthcoming*)

Massachusetts Bar No. 663726

Adam J. Kessel (*Pro Hac Vice forthcoming*)

Massachusetts Bar No. 661211

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Attorneys for Defendant

Braden Europe B.V.

f/k/a Innova Global Europe B.V.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on March 14, 2023 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5.1.

/s/ Bailey K. Benedict

Bailey K. Benedict